

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

:CASE NO: 2:07-CR-001

:CASE NO: 2:11-CR-223

:JUDGE WATSON

**ARTHUR SCHLICHTER,
SSN: ***-**-2027**

Defendant.

and

**BERT BELL/PETE ROZELLE NFL PLAYER
RETIREMENT PLAN AND NFL SECOND
CAREER SAVINGS PLAN**

Garnishee.

APPLICATION FOR A WRIT OF CONTINUING GARNISHMENT

The United States of America, by and through its representative the United States Attorney for the Southern District of Ohio, for its cause of action alleges:

1. Plaintiff United States of America, pursuant to 28 U.S.C. § 3205(b)(1), requests the issuance of a Writ of Continuing Garnishment against certain property of Defendant Arthur Schlichter (“Defendant”), which is (or may become) in the possession, custody or control of Bert Bell/Pete Rozelle NFL Player Retirement Plan and NFL Second Career Savings Plan, (“Garnishee”), for satisfaction of the monies owed by Defendant to the United States due to the judgments entered against the Defendant in the above-captioned cases.

2. These debts arise from the April 5, 2001 judgment and May 16, 2012 judgment entered against Defendant in Case No. 2:07-CR-001 and Case No. 2:11-CR-223. The amount of the debt that remains unpaid and due and owing is \$75,910.00, as of November 8, 2017, in Case No. 2:07-CR-001, with no interest accruing. The amount of the debt that remains unpaid and due and owing is \$2,189,781.95, as of November 8, 2017, in Case No. 2:11-CR-223, also with no interest accruing.

3. Defendant's last known address is: FCI Williamsburg, P.O. Box 220, Salters, SC 29590.

4. Not less than 30 days has elapsed since demand for payment was made upon Defendant. The last demand notice for payment was December 14, 2010 in Case No. 2:07-CR-001 and June 29, 2012 in Case No. 2:11-CR-223. Since that time, Defendant has failed to pay the total amount due.

5. Garnishee is believed to have possession of property in which Defendant has a substantial nonexempt interest, and will owe the money or property to Defendant.

6. The name and address of the Garnishee or its authorized agent is:
Bert Bell/Pete Rozelle NFL Player Retirement Plan and
NFL Player Second Career Savings Plan
Attn: Alvaro Anillo, Esq.
1701 Pennsylvania Ave., NW
Washington, DC 20006

7. Since Defendant has two outstanding criminal debts with the government, this application is being filed in both cases. Any funds obtained from the garnishment shall first be applied to the outstanding criminal obligation in Case No. 2:07-CR-001 as that judgment was issued first and has a nonfederal victim. Once that judgment is satisfied in full, the garnished funds shall be applied to the outstanding criminal obligation in Case No. 2:11-CR-223 until that debt is satisfied.

The requirements of 28 U.S.C. § 3205(b) having been satisfied, the United States hereby requests the issuance of a Writ of Continuing Garnishment.

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

s/ Bethany J. Hamilton

BETHANY J. HAMILTON (0075139)

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CERTIFICATE OF SERVICE

A true copy of the above and foregoing Application for a Writ of Continuing Garnishment was electronically filed with the Clerk of the Court using the CM/ECF system and mailed to by first class mail, postage prepaid, this 22nd day of November, 2017 to:

Arthur Schlichter
FCI Williamsburg
P.O. Box 220
Salters, SC 29590.

Bert Bell/Pete Rozelle NFL Player Retirement Plan and
NFL Player Second Career Savings Plan
Attn: Alvaro Anillo, Esq.
1701 Pennsylvania Ave., NW
Washington, DC 20006

s/ Bethany J. Hamilton

BETHANY J. HAMILTON (0075139)
Assistant United States Attorney